

1 D. EDWARD HAYS, #162507
ehays@marshackhays.com
2 TINHO MANG, #322146
tmang@marshackhays.com
3 MARSHACK HAYS WOOD LLP
870 Roosevelt
Irvine, CA 92620
4 Telephone: (949) 333-7777
5 Facsimile: (949) 333-7778

6 Attorneys for Chapter 7 Trustee,
A. CISNEROS

7 UNITED STATES BANKRUPTCY COURT

8 CENTRAL DISTRICT OF CALIFORNIA – RIVERSIDE DIVISION

9 In re

10 SHAMICKA LAWRENCE,

11 Debtor.

Case No. 6:23-bk-15163-WJ

Chapter 7

**STIPULATION FOR EXTENSION OF
DEADLINE TO OBJECT TO
DISCHARGE**

[NO HEARING REQUIRED]

14
15 TO THE HONORABLE WAYNE E. JOHNSON, UNITED STATES BANKRUPTCY JUDGE,
16 THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED PARTIES:

17 This stipulation (“Stipulation”) is entered into between Arturo M. Cisneros, in his capacity as
18 Chapter 7 Trustee (“Trustee”) of the Bankruptcy Estate (“Estate”) of Shamicka Lawrence
19 (“Debtor”), and Debtor, with regard to the following:

20 **Recitals**

21 A. On November 3, 2023 (“Petition Date”), Debtor filed a voluntary petition under
22 Chapter 7 of Title 11 of the United States Code, initiating the above-captioned bankruptcy case.
23 Arturo M. Cisneros (previously defined as “Trustee”) was appointed as the Chapter 7 Trustee.

24 B. Debtor’s schedules disclosed an interest in real property commonly known as 11364
25 Estates Court, Riverside, CA 92503 (“Property”), with a scheduled value of \$1,200,000. Debtor also
26 scheduled a homestead exemption in the Property.

27 C. The Debtor’s schedules also disclose an ownership interest in various entities.

28 D. On December 6, 2023, the Trustee conducted the initial meeting of creditors. The

1 341(a) was continued to January 3, 2024, and then January 24, 2024.

2 E. The deadline to object to discharge is February 5, 2024 ("Discharge Deadline").

3 F. The Trustee has requested voluminous documentation regarding the Debtor's interests
4 in the Property and the entities, among other things. Additional time is needed to obtain and analyze
5 the documents. Consequently, the Parties have agreed to extend the deadline pursuant to this
6 stipulation.

7 The Parties agree and STIPULATE as follows:

8 1. The deadline for Trustee and the Office of the United States Trustee ("OUST") to file
9 an objection to discharge shall be extended through and including April 5, 2024 ("Extended
10 Deadline").

11 2. The Extended Deadline shall be applicable only to the Trustee and OUST and no
12 other party in interest.

13 3. The Stipulation is without prejudice to any further extensions of the deadline to object
14 to exemptions, to be made by further motion or stipulation.

15 4. This Stipulation may be executed in one or more counterparts and facsimile or
16 electronic signatures may be used in filing this document with the Court.

17 Dated: February 9, 2024

MARSHACK HAYS WOOD LLP

18 By: /s/ Tinho Mang
19 D. EDWARD HAYS
20 TINHO MANG
21 Attorneys for Chapter 7 Trustee
A. CISNEROS

22 Dated: February __, 2024

SHAMICKA LAWRENCE

23 By: [Signature]
DEBTOR

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **STIPULATION FOR EXTENSION OF DEADLINE TO OBJECT TO DISCHARGE** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **January 9, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **CHAPTER 7 TRUSTEE ARTURO CISNEROS (TR):** Arturo Cisneros (TR) amctrustee@mclaw.org, acisneros@iq7technology.com; ecf.alert+Cisneros@titlexi.com
- **INTERESTED PARTY:** Alan W Forsley alan.forsley@flpllp.com, awf@fklawfirm.com, awf@fl-lawyers.net, addy@flpllp.com
- **ATTORNEYS FOR TRUSTEE:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.co
- **ATTORNEY FOR DEBTOR SHAMICKA LAWRENCE:** Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com, addy@flpllp.com
- **ATTORNEYS FOR TRUSTEE:** Tinho Mang tmang@marshackhays.com, tmang@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@ecf.courtdrive.com
- **US TRUSTEE:** United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **January 9, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

SHAMICKA LAWRENCE
11364 ESTATES COURT
RIVERSIDE, CA 92503

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 9, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**HONORABLE WAYNE E. JOHNSON - VIA OVERNIGHT MAIL
PRESIDING JUDGE'S COPY**

United States Bankruptcy Court
Central District of California
3420 Twelfth Street, Suite 384 / Courtroom 304
Riverside, CA 92501-3819

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 9, 2024

Date

Cynthia Bastida

Printed Name

/s/ Cynthia Bastida

Signature